

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 18-CR-264-RWS-PLC
)	
ZACHARY KYLE HAMBY,)	
)	
Defendant.)	

DEFENDANT’S MOTION TO EXTEND TIME TO FILE PRE-TRIAL MOTIONS

Comes now Defendant, by his attorney, John D. Stobbs II, and for his Motion to Extend Time to File Pre-Trial Motions states:

1. The undersigned was in the process of working with Deputy U.S. Marshal Marten to ensure that he could meet face-to-face with his client at the Randolph County Jail. (Exhibit A)

2. Sadly, due to Deputy Marshal Marten’s passing, this could not be accomplished.

3. The undersigned needs to meet face to face and in private with Defendant to discuss various matters involving his case. Deputy U.S. Marshal was in the process of facilitating this and additional time is required to ensure that this can take place.

4. The undersigned is presently set for a jury trial before the Honorable Nancy Rosenstengel in *U.S.A. v. Bland* during the week of October 19, 2020.

WHEREFORE, Defendant requests until November 2, 2020 in which to file or waive the filing of pre-trial Motions.

ZACHARY KYLE HAMBY

STOBBS LAW OFFICES

BY:

/s/John D. Stobbs II

John D. Stobbs II, No. 43052

E.D.Mo. Number 40623

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CERTIFICATE OF SERVICE

I hereby certify that on September 17, 2020, a copy of the attached *Defendant's Motion to Extend Time to File Pre-Trial Motions* was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Ms. Colleen Lang
Assistant U.S. Attorney
111 S. 10th Street
St. Louis, Missouri 63102

STOBBS LAW OFFICES

/s/ John D. Stobbs II
Attorney for Defendant
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